U.S. ENVIRONMENTAL PROTECTION AGENCY
SITE PROGRESS REPORT

Site: Clayton & Boyle
ID # MOD000381889
Break: 2.5
Other:
6-15-95

I. HEADING

DATE: June 15, 1995

FROM: James R. MacDonald, OSC
U.S. EPA, Region VII

TO: John Riley, Acting Director (5202G)
Emergency Response Division

SUBJECT: Clayton Boyle Drums

REPORT: #1 and Final

II. BACKGROUND

Site Number:	RQ
CERCLIS ID:	MO0000381889
Category of Removal:	Time Critical
National Significance:	No
Start Date:	January 5, 1995
Completion Date:	February 23, 1995
Delivery Order Number:	0035-07-082
State Notification:	MDNR referred the case to EPA
Action Memorandum Status:	Signed November 16, 1994

III. SITE INFORMATION

A. Incident Category: Emergency Response

B. Site Description

This site was created as the result of an unknown individual(s) dumping two 55-gallon drums onto a loading area of the St. Louis Envelope Company in the spring of 1992. The envelope company is located at 4254 Clayton Avenue, St. Louis, Missouri (corner of Clayton and Boyle). The area is surrounded by heavily traveled roads and businesses. One drum was marked "Wincide, disinfectant, net content, Industrial Soap Company." Contact was made with the company; however, the hazardous ingredients did not compare with the sample analysis from the waste in the drum. Responsible parties associated with the waste products in the drum were not found. There were no known witnesses to the dumping of the drums. By letter dated March 1, 1994, the Missouri Department of Natural Resources (MDNR) requested the Environmental Protection Agency's (EPA) assistance in disposing the drums by letter dated March 1, 1994.

C. Preliminary Assessment Results

Sample analysis indicated the Resource Conservation and Recovery Act (RCRA) characteristic waste was present in both of the drums sampled. Waste constituents in the waste material included xylene, toluene, ethyl benzene and benzene and were considered to be a mixture of waste solvents and waste oils. Xylenes act as a severe skin and eye irritant, are mildly toxic by ingestion and inhalation, and present a potential fire hazard. Toluene and ethyl benzene are both a dangerous fire hazard, are toxic by ingestion and inhalation, and act as skin and eye irritants. The primary threat to the environment from these materials is the threat of fire or explosion.

IV. RESPONSE INFORMATION

A. Situation

1/5/95 - Riedel Environmental Services (RES) received the information packet with maps and analytical data on each of the nine drum sites, including the Clayton Boyle drum site. RES initiated the Request for Quotation (RFQ) for transportation and disposal of the drums. RES invited the following companies to bid: Chem-Met, Burlington Environmental Inc., Laidlaw, Essex, and Rollins Chempack.

1/12/95 - RES conducted a site inspection of each drum site including the Clayton Boyle site. RES located two 55-gallon blue drums at the loading docks of the St. Louis Envelope Co. The drums needed to be overpacked.

1/17/95 - Chem-Met was low bidder on the transportation/disposal of the drums. RES contacted Edmund Burks at the EPA Region IV office to check the compliance status of the Chem-Met Georgia facility (Chem-Conservation of Georgia). Region IV indicated it was in compliance. Chem-Met stated no further analysis or samples were necessary for wastestream approval.

1/30/95 - RES created a uniform health and safety plan for all the drum sites. RES also picked up empty overpack drums at Castlewood, rented a bobcat, and utilized a 2-ton truck with trailer and a pickup truck for overpacking and sampling as required at the drum sites. RES overpacked the two drums at the Clayton Boyle site and labeled them 1 and 2.

2/23/95 - RES coordinated with Chem-Met for pick-up and transportation/disposal of drums from several sites. RES utilized a bobcat and 2-ton truck with trailer. The two overpacked drums at Clayton Boyle were labeled and manifested onto the Chem-Met truck.

B. Key Issues

There is no temporary staging area for drums in the St. Louis area by either local or state authorities. All abandoned drums have to be left on site until they can be disposed, thereby increasing the potential for vandalism.

V. COST INFORMATION

Extramural Costs	
ERCS Delivery Order Ceiling	$4,000.00
ERCS Costs (COB Apr 30)	1,845.31
Ceiling Remaining	$2,154.69
Percent of Ceiling utilized	46%
Intramural Costs	
Current Ceiling	$6,000.00
Total Cost Estimate (COB Mar 22)	902.00
Intramural Project Ceiling Remaining	$5,098.00

VI. DISPOSITION OF WASTES

The wastestream was processed at the Valdosta, Georgia, facility, 1612 James P. Rodgers Circle, (912) 244-0474. Chemical Conservation of Georgia had the appropriate local, state, and federal permits to process the wastestream.

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